

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
JOHANZ X. SANTOS, ppa, DENISE COLON,) C.A. No.: 03-12210MLW
DENISE COLON, Individually, JESUS SANTOS,)
)
Plaintiffs,)
)
v.)
)
BOB'S DISCOUNT FURNITURE; REGENT)
HOME DELIVERY; AGNILIZ ACOSTAS;)
RAUL SANTOS,)
)
Defendants.)

PLAINTIFF DENISE COLON'S ANSWERS TO INTERROGATORIES
PROPOUNDED BY THE DEFENDANT, BOB'S DISCOUNT FURNITURE

INTERROGATORY NO. 1

Kindly state your name, residential address, occupation, social security number
and date
of birth.

ANSWER NO. 1

Denise Colon Santos
7427 Bannard Avenue
Pennsauken, NJ 08110
ver, Laidlaw Transit Services, New Jersey

INTERROGATORY NO. 2

How are you related to Johanz Santos?

ANSWER NO. 2

Mother

INTERROGATORY NO. 3

If you claim to have been injured by the accident that occurred on March 30, 2002, kindly state with specificity each and every injury that you claim.

ANSWER NO.3

I suffered severe emotional distress as a result of my son's accident and injuries.

INTERROGATORY NO. 4

Kindly state where you were and what you were doing on March 30, 2002 at the accident which is the subject matter of this suit.

ANSWER NO. 4

I was visiting family in Springfield, MA. My son Johanz was playing baseball with the other children. He went to get a ball that had gone into the street. There was a Bob: Discount Furniture delivery truck illegally parked in a "No Parking" zone outside the building located at 27 Federal Street in the area where Johanz was playing. As my son went out into the street, in front of the illegally parked truck, after the ball he was struck by a vehicle operated by Raul Santos. I was watching my son and the other children from the window. We immediately ran downstairs to see our son. My son sustained serious and permanent injuries as a result of this incident.

INTERROGATORY NO. 5

Kindly state with specificity how you claim the accident happened.

ANSWER NO. 5

I was visiting family in Springfield, MA. My son Johanz was playing baseball with the other children. He went to get a ball that had gone into the street. There was a Bob's Discount Furniture delivery truck illegally parked in a "No Parking" zone outside the building located at 27 Federal Street in the area where Johanz was playing. As my son went out into the street, in front of the illegally parked truck, after the ball he was struck by a vehicle operated by Raul Santos. I was watching my son and the other children from the window. We immediately ran downstairs to see our son. My son sustained serious and permanent injuries as a result of this incident.

INTERROGATORY NO. 6

If you do not personally witness the accident when and how was it that you first heard of the accident?

